STAMPUR & ROTH

WILLIAM J. STAMPUR JAMES ROTH

MEMO ENDORSED

The Application is granted.

O PROFRED:

Paul G. Gardephe, U.S.D

Dated: March 3, 2022

March 2, 2022

By ECF

Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Soulaimane Bah, 21 Cr. 654 (PGG)

Dear Judge Gardephe:

I am counsel of record for Soulaimane Bah in the above-captioned matter. I write to respectfully request a variance in Mr. Bah's pretrial travel restrictions which are presently limited to the Southern and Eastern Districts of New York.

Mr. Bah respectfully requests to travel to Cobayah tie 5, Conakry, Guinea, in West Africa to visit his father who is suffering from a serious heart ailment. Mr. Bah's Pretrial Officer, Dominique Jackson, and AUSA David Robles have no objection to a travel request, however, Ms. Jackson informed counsel that Pretrial ordinarily consents to international travel when the duration of the trip is one week or less. Mr. Bah is requesting a trip of approximately two weeks, given both the distance of travel and the recognition that he may never again see his ailing father due to his medical situation.

If approved, Mr. Bah will be leaving from JFK on Monday, March 14, 2022 and returning to JFK on Tuesday, March 29, 2022. Enclosed for the Court's consideration is a flight itinerary detailing the dates and times of the flights Mr. Bah will need to take. Mr. Bah's father can be reached by telephone at +224 666611050.

Mr. Bah is presently enrolled in the Focus Forward Program and has indicated to counsel that he can participate remotely in the next two sessions while he is abroad.

Thank you for your attention to this matter.

Very truly yours,

William J. Stampur William J. Stampur

AUSA David Robles (BY ECF), PTO Dominique Jackson (By Email)

Encls.

cc:

WS/Bah/Ltr Rqst to Ct/Travel to Africa



Close

Your flight to Conakry

Flight to Conakry

1 stop · 20h 45m

Mon, Mar 14 · 8:30 PM

JFK · New York J F Kennedy International Apt



Air France

AF7 - Economy Flight time 7h 20m

Tue, Mar 15 · 8:50 AM

CDG · Paris Charles De Gaulle Apt

Tue, Mar 15 · 1:20 PM

CDG · Paris Charles De Gaulle Apt



Air France

AF596 · Economy

Flight time 8h 55m

Tue, Mar 15 · 9:15 PM

CKY · Conakry

Flight to New York

\$1,065.82 ②

Total price for all travelers

Select

AA a flights.booking.com

Flight to New York

1 stop · 16h 50m

Mon, Mar 28 · 9:55 PM

CKY · Conakry

Air France

AF597 - Economy Flight time 6h 15m

Tue, Mar 29 · 6:10 AM

CDG · Paris Charles De Gaulle Apt

Tue, Mar 29 · 8:35 AM

CDG · Paris Charles De Gaulle Apt



Air France

AF22 · Economy Flight time 8h 10m

Tue, Mar 29 - 10:45 AM

JFK · New York J F Kennedy International Apt

Included baggage

The total baggage included in the price



1 personal item

Must go under the seat in front of you Included



1 carry-on bag

Max weight 26.5 lbs

Included



2 checked hans

\$1,065.82 ②

Total price for all travelers

Select

flights.booking.com